

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE BUYING TRIANGLE, LLC,

Plaintiff,

-against-

INFOSYS BPO LIMITED, f/k/a Progeon Limited,

Defendant.

INFOSYS BPO LIMITED,

Counter-Complainant,

-against-

THE BUYING TRIANGLE, LLC,

Counter-Defendant.

DO NOT WRITE

ELECTRONICALLY FILED

DOC #:

DATE FILED: 8/15/07

Case No. 07-CV-4647 (GEL)

CIVIL CASE MANAGEMENT PLAN

(Judge Gerard E. Lynch)

After consulting with all of the parties, the following Case Management Plan is adopted. This plan is also a scheduling order pursuant to Rule 16 and 26(f) of the Federal Rules of Civil Procedure.

1. The case is to be tried by a jury. Scheduling of pre-trial practice should be arranged with a view to having the case ready for trial within approximately six months of the initial pre-trial conference.
2. Joinder of the parties must be accomplished by August 17.
3. Amended pleadings may be filed until August 31.
4. All fact discovery is to be completed by February 28, 2008. Interim deadlines set below may be extended by the parties on consent without application to the Court, provided the

parties can still meet the discovery completion date ordered by the Court, which shall not be adjourned except upon a showing of extraordinary circumstances.

- a. First request for production of documents, if any, to be served by September 14, 2007.
 - b. Interrogatories pursuant to Local Rule 33.3(a) of the Civil Rules of the Southern District of New York to be served by September 21, 2007. No other interrogatories are permitted except upon prior express permission of the Court.
 - c. Depositions to be completed by February 28, 2008.
 - i. Unless counsel agree otherwise or the Court so orders, deposition are not to be held until all parties have responded to any first requests for production of documents.
 - ii. Depositions shall proceed concurrently.
 - iii. Whenever possible, unless counsel agree otherwise or the Court so orders, non-party depositions shall follow party depositions.
 - iv. No depositions shall be extended beyond two business days without prior leave of the Court.
 - d. Experts, if any, are to be designated by February 9, 2008 and experts' reports exchanged no later than February 9, 2008. Experts may be deposed, but such depositions must occur within the time limit set forth for all depositions set forth above.
 - e. Requests to Admit, if any, are to be served no later than February 9, 2008.
5. Dispositive motions are to be served by March 21, 2008.
Answering papers are to be served by April 11, 2008.
Reply papers are to be served by April 18, 2008.

All motions and applications are to be governed by the Court's Individual Practice Rules, which are available on the Internet at <http://www.nysd.uscourts.gov>. Note that under those rules, two courtesy copies of all motion papers are to be provided to chambers by the movant at the time the reply is filed. It is the responsibility of the movant to make sure that copies of all parties' papers are provided at that time.

6. The joint pretrial order shall be filed no later than 30 days after the completion of discovery, or after the final decision on any dispositive motion, whichever is later, unless a different date is set by order of the Court. The requirements for the pre-trial order and other pre-trial submissions shall be governed by the Court's Individual Practice Rules.

7. Counsel consent to trial by a U.S. Magistrate Judge.

Yes _____ No X _____

NEXT CASE MANAGEMENT CONFERENCE

MARCH 7, 2008 @ 11AM
(To be completed by the Court)

Dated: Aug. 15, 2007
New York, New York

SO ORDERED:

Gerard E. Lynch
GERARD E. LYNCH
United States District Judge